

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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ARCH INSURANCE COMPANY,

Plaintiff,

vs.

Civil No. 2:23-CV-02689

Varsity Brands Holding Co., Inc.; and  
U.S. All Star Federation, Inc.,

Defendants.

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**DEFENDANT Varsity Brands Holding Co., Inc.’S UNOPPOSED MOTION  
TO SET TIME TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT  
AND CERTIFICATE OF CONSULTATION**

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COMES NOW Varsity Brands Holding Co., Inc. (“Varsity”) and makes this motion to set the deadline for Varsity to answer or otherwise respond to Plaintiff’s Complaint as follows:

Plaintiff filed its Complaint on October 30, 2023. Plaintiff filed a return of service showing a service date of November 7, 2023.

As a result of discussions of counsel, Plaintiff and Varsity have agreed that Varsity will answer or otherwise respond to the Complaint by January 20, 2024, subject to the approval of the Court.

This motion is made in good faith and is not filed for the purpose of delay. No party will be prejudiced by the delay, as Defendant U.S. All Star Federation, Inc. was previously granted until January 20, 2024 to answer or otherwise respond.

Varsity reserves all of its defenses and objections including, but not limited to, those under Fed. R. Civ. P. 12 except as to the effectiveness of service.

WHEREFORE, Varsity requests that the Court enter an Order setting the time for Varsity to answer or otherwise respond to the Complaint to January 20, 2024.

**CERTIFICATE OF CONSULTATION**

Pursuant to Local Rule 7.2(a)(1)(B), the undersigned certifies that on November 22, 2023, the undersigned was provided with an email from Plaintiff's counsel, Sharon F. McKee, Esq., indicating that Plaintiff did not object to the relief sought in this motion.

Respectfully submitted,

/s/ Shea Sisk Wellford

Shea Sisk Wellford (TN Bar No. 16947)

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*Attorneys for Varsity Brands Holding Co., Inc.*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on November 22, 2023, a copy of the foregoing was filed using the Court's CM/ECF system, which electronically served the following:

D. Craig Lamb, Esq.  
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/s/Shea Sisk Wellford